

RECEIVED  
FEDERAL ELECTION  
COMMISSION  
SECRETARIAT

FEDERAL ELECTION COMMISSION

2010 JUN 17 P 1:13

In the matter of:

**SENSITIVE**

MUR No. **6312**

RECEIVED  
FEDERAL ELECTION  
COMMISSION  
2010 JUN 15 PM 2:11  
OFFICE OF GENERAL  
COUNSEL

Brian Lamont Doyle  
Brian "Ryan B" Doyle for Congress

**COMPLAINT**

1. Citizens for Responsibility and Ethics in Washington ("CREW") and Melanie Sloan bring this complaint before the Federal Election Commission ("FEC") seeking an immediate investigation and enforcement action against

Brian Lamont  
Doyle and Brian "Ryan B" Doyle for Congress for direct and serious violations of the Federal Election Campaign Act ("FECA").

**Complainants**

2. Complainant CREW is a non-profit corporation, organized under section 501(c)(3) of the Internal Revenue Code. CREW is committed to protecting the right of citizens to be informed about the activities of government officials and to ensuring the integrity of government officials. CREW is dedicated to empowering citizens to have an influential voice in government decisions and in the governmental decision-making process. CREW uses a combination of research, litigation, and advocacy to advance its mission.

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3. In furtherance of its mission, CREW seeks to expose unethical and illegal conduct of those involved in government. One way CREW does this is by educating citizens regarding the integrity of the electoral process and our system of government. Toward this end, CREW monitors the campaign finance activities of those who run for federal office and publicizes those who violate Federal campaign finance laws. Through its website, press releases and other methods of distribution, CREW also files complaints with the FEC when it discovers violations of the FECA. Publicizing campaign finance violators and filing complaints with the FEC serves CREW's mission of keeping the public informed about individuals and entities who violate campaign finance laws and deterring future violations of campaign finance law.

4. In order to assess whether an individual, candidate, political committee or other regulated entity is complying with federal campaign finance law, CREW needs the information contained in receipts and disbursements reports that political committees must file pursuant to the FECA, 2 U.S.C. § 434(a)(2); 11 C.F.R. § 104.1. CREW is hindered in its programmatic activity when an individual, candidate, political committee or other regulated entity fails to disclose campaign finance information in reports of receipts and disbursements required by the FECA.

5. CREW relies on the FEC's proper administration of the FECA's reporting requirements because the FECA-mandated reports of receipts and disbursements are the only source of information CREW can use to determine if a candidate, political committee or other regulated entity is complying with the FECA. The proper administration of the FECA's reporting requirements includes mandating that all reports of receipts and disbursements required by the FECA are properly and timely filed with the FEC. CREW is hindered in its programmatic activity when the FEC fails to properly administer the FECA's reporting requirements.

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6. Complainant Melanie Sloan is the executive director of Citizens for Responsibility and Ethics in Washington, a citizen of the United States and a registered voter and resident of the District of Columbia. As a registered voter, Ms. Sloan is entitled to receive information contained in reports of receipts and disbursements required by the FECA, 2 U.S.C. § 434(a)(2); 11 C.F.R. § 104.1. Ms. Sloan is harmed when a candidate, political committee or other regulated entity fails to report campaign finance activity as required by the FECA. See FEC v. Akins, 524 U.S. 11, 19 (1998), quoting Buckley v. Valeo, 424 U.S. 1, 66-67 (1976) (political committees must disclose contributors and disbursements to help voters understand who provides which candidates with financial support). Ms. Sloan is further harmed when the FEC fails to properly administer the FECA's reporting requirements, limiting her and CREW's ability to review campaign finance information.

Respondents

10. Brian Lamont Doyle was a candidate in the June 8, 2010 South Carolina primary election seeking the nomination of the Democratic Party to represent the Third Congressional District of South Carolina in the U.S. House of Representatives. Brian "Ryan B" Doyle is the principal campaign committee of Brian Lamont Doyle.

Factual Allegations

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**COUNT II**

17. FECA and FEC regulations both require that the principal campaign committee of a candidate for the House of Representatives or the Senate file quarterly reports with the FEC no later than the fifteenth day after the last day of each calendar quarter. 2 U.S.C. § 434(a)(2)(A)(iii) and 11 C.F.R. § 104.5(a)(1)(i).

18. By failing to file the April 15<sup>th</sup> Quarterly Report for calendar year 2010,

Brian Lamont Doyle and Brian "Ryan B" Doyle for Congress knowingly and willfully violated both 2 U.S.C. § 434(a)(2)(A)(iii) and 11 C.F.R. § 104.5(a)(1)(i).

**COUNT III**

19. FECA and FEC regulations both require that the principal campaign committee of a candidate for the House of Representatives or the Senate file a pre-election report with the FEC 12 days before any election in which the candidate is seeking election. 2 U.S.C. § 434(a)(2)(A)(i) and 11 C.F.R. § 104.5(a)(2)(i).

20. The 12-Day Pre-Primary Report for the June 8, 2010 Democratic primary election in South Carolina was due on May 27, 2010.


21. By failing to file the 12-Day Pre-Primary Report for the June 8, 2010 Democratic primary election in South Carolina on May 27, 2010,

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**Brian Lamont Doyle**  
and Brian "Ryan B" Doyle for Congress knowingly and willfully violated both 2 U.S.C.  
§ 434(a)(2)(A)(i) and 11 C.F.R. § 104.5(a)(2)(T).

**CONCLUSION**

**WHEREFORE, Citizens for Responsibility and Ethics in Washington and  
Melanie Sloan request that the Federal Election Commission conduct an investigation  
into these allegations, declare the respondents to have violated the Federal Election  
Campaign Act and applicable FEC regulations, and impose sanctions appropriate to  
these violations. The FEC should also take such further action as may be appropriate,  
including referring knowing and willful violations to the Department of Justice for  
criminal investigation.**

  
**Melanie Sloan**  
**Executive Director**  
**Citizens for Responsibility and Ethics**  
**in Washington**  
**1400 Eye Street, N.W.**  
**Suite 450**  
**Washington, DC 20005**  
**(202) 408-5566 (phone)**  
**(202) 588-5020 (fax)**

**Verification**

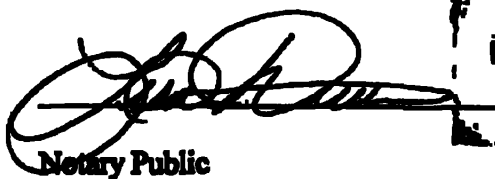
**Citizens for Responsibility and Ethics in Washington and Melanie Sloan hereby verify  
that the statements made in the attached Complaint are, upon information and belief, true.**

**Sworn pursuant to 18 U.S.C. § 1001.**

A handwritten signature in black ink, appearing to be 'MS', written over a horizontal line.

**Melanie Sloan**

**Sworn to and subscribed before me this 15<sup>th</sup> day of June, 2010.**

A handwritten signature in black ink, appearing to be 'Lisa Drew', written over a horizontal line.

**Notary Public**

**Lisa Drew  
District of Columbia, Notary Public  
My Commission Expires  
July 31, 2014**

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## **EXHIBIT 10**

**FEC FORM 2**  
**STATEMENT OF CANDIDACY**

1. Name of Candidate (in full) <b>Brian Lament Doyle</b>		2. Party Affiliation <b>Democrat</b>	
3. Address (number and street) <b>11 Dunliffe Rd</b>		4. Name of District of Candidates <b>2nd Congressional District SC</b>	
5. Home, Work, and Cell Phone <b>Aiken, SC 29801</b>		6. Date of Statement <b>7/09</b>	
7. Office Designation <b>US Congress</b>		8. Date of Election <b>Nov 03</b>	
9. Date of Birth <b>11/21/1971</b>		10. Date of Statement <b>7/09</b>	
11. Date of Election <b>Nov 03</b>		12. Date of Statement <b>7/09</b>	

7. I hereby designate the following named political committee as my Principal Campaign Committee for the 2018 election(s).

### (b) Names of Countries (in full)

# Brian 'Ryan B' Doyle for Congress

(b) Address (number and street)

**P.O. Box 936**

**60 Days, 600, and 200 Cents**

A.k.a. SC 29501

(Including Joint Funding Agreements)

8. I hereby authorize the following named committee, which is NOT my principal campaign committee, to receive and expend funds on behalf of my campaign:

**NOTE:** This designation should be filed with the principal campaign committee.

**STANDARD CONTRACT**

### THE ADDRESS (continued)

**1st Class, 2nd Class, and 3rd Class**

**I certify that I have examined this Statement and to the best of my knowledge and belief it is true, correct and complete.**

### Statement of Conditions

12-01-2009

**(b)(7)(F) Submission of false, erroneous, or incomplete information may subject the person signing this Statement to penalties of 18 U.S.C. § 1001.**

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**THE UNIVERSITY OF CHICAGO**

**29830281841**

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## **EXHIBIT 11**

RECEIVED  
FEC MAIL CENTER  
2010 JAN 11 AM 10:08

FEC  
FORM 1

STATEMENT OF  
ORGANIZATION

File this only

1. NAME OF COMMITTEE (in full) ☐ (Check if name is changed) Example: type type over the first 1278485  
Committee to elect Brian "Ryan B" Doyle to Congress  
ADDRESS (number and street) P.O. Box 936  
☐ (Check if address is changed) 11 Pipe Line, R.D.  
A.KEN. GA 32801  
CITY STATE ZIP CODE

COMMITTEE'S E-MAIL ADDRESS (Please provide only one e-mail address)  
☐ (Check if address is changed) bdoyle@briandoyleforcongress.com  
dnettl@juno.com

COMMITTEE'S WEB PAGE ADDRESS (URL)  
☐ (Check if address is changed) www.briandoyleforcongress.com

2. DATE 07/04/2010

3. FED IDENTIFICATION NUMBER 10

4. IS THIS STATEMENT ☒ NEW (N) OR ☐ AMENDED (A)

I certify that I have examined this Statement and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer Darryl Nettles

Signature of Treasurer [Signature] Date 07/04/2010

NOTE: Submission of false, incorrect, or incomplete information may subject the person signing this Statement to the penalties of a U.S.C. 9507.  
ANY CHANGE IN INFORMATION SHOULD BE REPORTED WITHIN 30 DAYS.

Other Use Only				
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For further information contact  
Federal Election Commission  
Tel: 202-454-4000  
Toll Free 800-424-9590  
Local 202-454-4100

FEC FORM 1  
(Updated 01/09/09)

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**5. TYPE OF COMMITTEE**

**Candidate Committee:**

- (a) ☒ This committee is a principal campaign committee. (Complete the candidate information below.)
- (b) ☐ This committee is an authorized committee, and is NOT a principal campaign committee. (Complete the candidate information below.)

Name of Candidate Brian Ryan B. Doyle

Candidate Party Affiliation DEM Office Sought ☒ House ☐ Senate ☐ President State SC District 03

- (c) ☐ This committee supports only one candidate, and is NOT an authorized committee.

Name of Candidate Brian Ryan B. Doyle

**Party Committee:**

- (d) ☐ This committee is a ☐ (National, State or subordinate) committee of the ☐ (Democratic, Republican, etc.) Party

**Political Action Committee (PAC):**

- (e) ☐ This committee is a separate segregated fund. (Identify connected organization on line 6.) Its connected organization is a:

☐ Corporation ☐ Corporation with Capital Stock ☐ Labor Organization  
☐ Membership Organization ☐ Trade Association ☐ Cooperative

☐ In addition, this committee is a Lobbyist/Regulatory PAC.

- (f) ☐ This committee supports more than one Federal candidate, and is NOT a separate segregated fund or party committee. (i.e., nonconnected committee)

☐ In addition, this committee is a Lobbyist/Regulatory PAC.

☐ In addition, this committee is a Leadership PAC. (Identify sponsor on line 6.)

**Joint Fundraising Representatives:**

- (g) ☐ This committee solicits contributions, pays fundraising expenses and disburses net proceeds for two or more political committees/organizations, at least one of which is an authorized committee of a federal candidate.

- (h) ☐ This committee solicits contributions, pays fundraising expenses and disburses net proceeds for two or more political committees/organizations, none of which is an authorized committee of a federal candidate.

**Committees Participating in Joint Fundraising:**

1.	<input type="checkbox"/>	FED ID number	<input type="checkbox"/>
2.	<input type="checkbox"/>	FED ID number	<input type="checkbox"/>
3.	<input type="checkbox"/>	FED ID number	<input type="checkbox"/>
4.	<input type="checkbox"/>	FED ID number	<input type="checkbox"/>

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FEC Form 1 (Revised 08/2000)

Page 3

Write or Type Committee Name

Committee to elect Brian "Ryan B" Doyle to Congress

6. Name of Any Connected Organization, Affiliated Committee, Joint Fundraising Representative, or Leadership PAC Sponsor

Mailing Address

CITY

STATE

ZIP CODE

Relationship: ☐ Connected Organization ☐ Affiliated Committee ☐ Joint Fundraising Representative ☐ Leadership PAC Sponsor

7. Custodian of Records: Identify by name, address (phone number - optional) and position of the person in possession of committee books and records.

Full Name

Mailing Address

Title or Position

CITY

STATE

ZIP CODE

Treasurer

Telephone number

8. Treasurer: List the name and address (phone number - optional) of the treasurer of the committee and the name and address of any designated agent (e.g., assistant treasurer).

Full Name  
of Treasurer

Mailing Address

Title or Position

Treasurer

CITY

STATE

ZIP CODE

Telephone number

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Full Name of  
Originator  
Agent

Mailing Address

Title or Position

Telephone number

2. Banks or Other Depositories: List all banks or other depositories in which the committee deposits funds, holds accounts, rents safety deposit boxes or maintains funds.

Name of Bank, Depository, etc.

Mailing Address

Name of Bank, Depository, etc.

Mailing Address

CITY

STATE

ZIP CODE